

CHRISTOPHER P. KOHN, ESQ.
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Christopher Kohn (CK5658)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
HENRY LAM, on behalf of himself and all
others similarly situated,

CLASS ACTION No.: 09CV5211

Plaintiffs,

-against-

DONALD J. TRUMP, TRUMP
ORGANIZATION, INC., TRUMP
ORGANIZATION, LLC, TRUMP MARKS,
LLC, TRUMP MARKS BAJA, LLC,
IRONGATE DEVELOPMENT, IRONGATE
WISHIRE, LLC, IRONGATE CAPITAL
PARTNERS, LLC, JASON GROSFELD,
ADAM FISHER, RICHARD FISHER,
CASEY FEDERMAN, JOSHUA CRANE,
FIRST AMERICAN FUND CONTROL, INC.,
CALIFORNIA FUND CONTROL, INC.,
SOUTHLAND TITLE CORP., SOUTHLAND
TITLE OF SAN DIEGO, LAWYERS TITLE
COMP., LANDAMERICA TITLE COMP.,
and PB IMPULSOIRES, S. de R.L. de C.V.
BANCO J.P. MORGAN, S.A., INSTITUCION
DE BANCA MULTIPLE, J.P. MORGAN
GRUPO FINANCIERO, DIVISION
FIDUCIARIA,

**VERIFIED ANSWER WITH
AFFIRMATIVE DEFENSES
AND CROSS-CLAIMS**

Defendants.

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Defendant Lawyers Title Company (hereinafter "Lawyers Title"), by its attorney,
Christopher P. Kohn, for its Answer to the Complaint, alleges as follows:

1. Paragraph “1” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

2. Paragraph “2” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

3. Paragraph “3” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

4. Paragraph “4” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

5. Paragraph “5” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

6. Paragraph “6” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of

law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

7. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “7” of the Complaint.

8. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “8” of the Complaint.

9. Defendant Lawyers Title denies each and every allegation contained in paragraph “9” of the Complaint to the extent that Lawyers Title never marketed or sold units in the Development or represented that Trump was a partner in the Project.

10. Defendant Lawyers Title denies each and every allegation contained in paragraph “10” of the Complaint in its entirety.

11. Defendant Lawyers Title denies each and every allegation contained in paragraph “11” of the Complaint in its entirety.

12. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “12” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “12” of the Complaint as it relates to Lawyers Title.

13. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “13” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “13” of the Complaint as it relates to Lawyers Title.

14. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “14” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “14” of the Complaint as it relates to Lawyers Title.

15. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “15” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “15” of the Complaint as it relates to Lawyers Title.

16. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “16” of the Complaint.

17. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “17” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “17” of the Complaint as it relates to Lawyers Title.

18. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “18” of the Complaint.

19. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “19” of the Complaint.

20. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “20” of the Complaint.

21. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “21” of the Complaint.

22. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “22” of the Complaint.

23. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “23” of the Complaint.

24. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “24” of the Complaint.

25. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “25” of the Complaint.

26. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “26” of the Complaint.

27. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “27” of the Complaint.

28. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “28” of the Complaint.

29. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “29” of the Complaint.

30. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “30” of the Complaint.

31. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “31” of the Complaint.

32. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “32” of the Complaint.

33. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “33” of the Complaint.

34. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “34” of the Complaint.

35. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “35” of the Complaint.

36. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “36” of the Complaint.

37. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “37” of the Complaint.

38. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “38” of the Complaint.

39. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “39” of the Complaint.

40. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “40” of the Complaint.

41. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “41” of the Complaint.

42. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “42” of the Complaint.

43. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “43” of the Complaint.

44. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “44” of the Complaint.

45. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “45” of the Complaint.

46. Defendant Lawyers Title denies each and every allegation contained in paragraph “46” of the Complaint except admits that Lawyers Title is a California corporation.

47. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “47” of the Complaint.

48. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “48” of the Complaint.

49. An answer to Paragraph “49 is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

50. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “50” of the Complaint.

51. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “51” of the Complaint.

52. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “52” of the Complaint.

53. Defendant Lawyers Title denies each and every allegation contained in paragraph “53” of the Complaint in its entirety.

54. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “54” of the Complaint.

55. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “55” of the Complaint.

56. Defendant Lawyers Title denies each and every allegation contained in paragraph “56” of the Complaint in its entirety.

57. Defendant Lawyers Title denies each and every allegation contained in paragraph “57” of the Complaint in its entirety.

58. Defendant Lawyers Title denies each and every allegation contained in paragraph “58” of the Complaint in its entirety.

59. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “59” of the Complaint.

60. Defendant Lawyers Title denies each and every allegation contained in paragraph “60” of the Complaint in its entirety.

61. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “61” of the Complaint.

62. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “62” of the Complaint.

63. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “63” of the Complaint.

64. Defendant Lawyers Title denies each and every allegation contained in paragraph “64” of the Complaint in its entirety.

65. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “65” of the Complaint.

66. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “66” of the Complaint.

67. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “67” of the Complaint.

68. Defendant Lawyers Title denies each and every allegation contained in paragraph “68” of the Complaint in its entirety.

69. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “69” of the Complaint.

70. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “70” of the Complaint.

71. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “71” of the Complaint.

72. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “72” of the Complaint.

73. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “73” of the Complaint.

74. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “74” of the Complaint.

75. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “75” of the Complaint.

76. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “76” of the Complaint.

77. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “77” of the Complaint.

78. Defendant Lawyers Title denies each and every allegation contained in paragraph “78” of the Complaint in its entirety.

79. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “79” of the Complaint.

80. Defendant Lawyers Title denies each and every allegation contained in paragraph “80” of the Complaint in its entirety.

81. Defendant Lawyers Title denies each and every allegation contained in paragraph “81” of the Complaint in its entirety.

82. Defendant Lawyers Title denies each and every allegation contained in paragraph “82” of the Complaint in its entirety.

83. Defendant Lawyers Title denies each and every allegation contained in paragraph “83” of the Complaint in its entirety.

84. Defendant Lawyers Title denies each and every allegation contained in paragraph “84” of the Complaint in its entirety.

85. Defendant Lawyers Title denies each and every allegation contained in paragraph “85” of the Complaint in its entirety.

86. Defendant Lawyers Title denies each and every allegation contained in paragraph “86” of the Complaint in its entirety.

87. Defendant Lawyers Title denies each and every allegation contained in paragraph “87” of the Complaint in its entirety.

88. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “88” of the Complaint.

89. Defendant Lawyers Title denies each and every allegation contained in paragraph “89” of the Complaint in its entirety.

90. Defendant Lawyers Title denies each and every allegation contained in paragraph “90” of the Complaint in its entirety.

91. Defendant Lawyers Title denies each and every allegation contained in paragraph “91” of the Complaint in its entirety.

92. Defendant Lawyers Title denies each and every allegation contained in paragraph “92” of the Complaint in its entirety.

93. Defendant Lawyers Title denies each and every allegation contained in paragraph “93” of the Complaint in its entirety.

94. Defendant Lawyers Title denies each and every allegation contained in paragraph “94” of the Complaint in its entirety.

95. Paragraph “95” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

96. Defendant Lawyers Title denies each and every allegation contained in paragraph “96” of the Complaint in its entirety.

97. Paragraph “97” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required; Defendant Lawyers Title refers all such questions of law to the Court. To the extent an answer is deemed required, Lawyers Title denies each and every allegation in its entirety.

98. Defendant Lawyers Title denies each and every allegation contained in paragraph “98” of the Complaint in its entirety.

99. Defendant Lawyers Title denies each and every allegation contained in paragraph “99” of the Complaint in its entirety.

100. Defendant Lawyers Title denies each and every allegation contained in paragraph “100” of the Complaint in its entirety.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT I – FRAUDULENT INDUCEMENT**

101. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “100” as if more fully set forth at length herein.

102. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “102” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “102” of the Complaint as it relates to Lawyers Title.

103. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “103” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “103” of the Complaint as it relates to Lawyers Title.

104. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “104” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “104” of the Complaint as it relates to Lawyers Title.

105. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “105” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “105” of the Complaint as it relates to Lawyers Title.

106. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “106” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “106” of the Complaint as it relates to Lawyers Title.

107. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “107” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “107” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT II – NEGLIGENT MISREPRESENTATION**

108. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “107” as if more fully set forth at length herein.

109. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “109” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “109” of the Complaint as it relates to Lawyers Title.

110. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “110” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “110” of the Complaint as it relates to Lawyers Title.

111. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “111” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “111” of the Complaint as it relates to Lawyers Title.

112. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “112” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “112” of the Complaint as it relates to Lawyers Title.

113. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “113” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “113” of the Complaint as it relates to Lawyers Title.

114. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “114” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “114” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT III - CONVERSION**

115. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “114” as if more fully set forth at length herein.

116. Defendant Lawyers Title denies each and every allegation contained in paragraph “116” of the Complaint in its entirety.

117. Defendant Lawyers Title denies each and every allegation contained in paragraph “117” of the Complaint in its entirety.

118. Defendant Lawyers Title denies each and every allegation contained in paragraph “118” of the Complaint in its entirety.

119. Defendant Lawyers Title denies each and every allegation contained in paragraph “119” of the Complaint in its entirety.

120. Defendant Lawyers Title denies each and every allegation contained in paragraph “120” of the Complaint in its entirety.

121. Defendant Lawyers Title denies each and every allegation contained in paragraph “121” of the Complaint in its entirety.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT IV – DECLARATORY RELIEF**

122. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “121” as if more fully set forth at length herein.

123. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “123” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “123” of the Complaint as it relates to Lawyers Title.

124. Defendant Lawyers Title denies each and every allegation contained in paragraph “124” of the Complaint in its entirety.

125. Defendant Lawyers Title denies each and every allegation contained in paragraph “125” of the Complaint in its entirety.

126. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “126” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “126” of the Complaint as it relates to Lawyers Title.

127. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “127” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “127” of the Complaint as it relates to Lawyers Title.

128. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “128” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “128” of the Complaint as it relates to Lawyers Title.

129. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “129” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “129” of the Complaint as it relates to Lawyers Title.

130. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “130” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “130” of the Complaint as it relates to Lawyers Title.

131. Defendant Lawyers Title denies each and every allegation contained in paragraph “131” of the Complaint in its entirety.

132. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “132” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “132” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT V – VIOLATION OF THE INTERSTATE
LAND FULL DISCLOSURE ACT, 15 U.S.C. 1703(a)(1)**

133. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “132” as if more fully set forth at length herein.

134. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “134” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “134” of the Complaint as it relates to Lawyers Title.

135. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “135” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “135” of the Complaint as it relates to Lawyers Title.

136. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “136” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “136” of the Complaint as it relates to Lawyers Title.

137. Paragraph “137” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required. To the extent an answer is required, Defendant Lawyers Title refers all such questions of law to the Court and denies knowledge or information sufficient to form a belief as to the allegations of paragraph “137” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “137” of the Complaint as it relates to Lawyers Title.

138. Paragraph “138” of the Complaint asserts Plaintiffs’ legal theories and conclusions of law to which an answer is not required. To the extent an answer is required, Defendant Lawyers Title refers all such questions of law to the Court and denies knowledge or information sufficient to form a belief as to the allegations of paragraph “138” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “138” of the Complaint as it relates to Lawyers Title.

139. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “139” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “139” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT VI – VIOLATION OF THE INTERSTATE
LAND FULL DISCLOSURE ACT, 15 U.S.C. 1703(d)(3)**

140. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “139” as if more fully set forth at length herein.

141. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “141” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “141” of the Complaint as it relates to Lawyers Title.

142. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “142” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “142” of the Complaint as it relates to Lawyers Title.

143. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “143” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “143” of the Complaint as it relates to Lawyers Title.

144. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “144” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “144” of the Complaint as it relates to Lawyers Title.

145. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “145” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “145” of the Complaint as it relates to Lawyers Title.

146. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “146” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “146” of the Complaint as it relates to Lawyers Title.

147. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “147” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “147” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT VII – VIOLATION OF THE INTERSTATE
LAND FULL DISCLOSURE ACT, 15 U.S.C. 1703(a)(2)(A)(B)(C)**

148. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “147” as if more fully set forth at length herein.

149. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “149” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “149” of the Complaint as it relates to Lawyers Title.

150. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “150” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “150” of the Complaint as it relates to Lawyers Title.

151. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “151” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “151” of the Complaint as it relates to Lawyers Title.

152. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “152” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “152” of the Complaint as it relates to Lawyers Title.

153. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “153” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “153” of the Complaint as it relates to Lawyers Title.

154. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “154” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “154” of the Complaint as it relates to Lawyers Title.

155. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “155” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “155” of the Complaint as it relates to Lawyers Title.

156. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “156” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “156” of the Complaint as it relates to Lawyers Title.

157. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “157” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “157” of the Complaint as it relates to Lawyers Title.

158. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “158” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “158” of the Complaint as it relates to Lawyers Title.

159. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “159” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “159” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT VIII – FRAUD – HUD REGISTRATION**

160. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “159” as if more fully set forth at length herein.

161. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “161” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “161” of the Complaint as it relates to Lawyers Title.

162. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “162” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “162” of the Complaint as it relates to Lawyers Title.

163. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “163” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “163” of the Complaint as it relates to Lawyers Title.

164. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “164” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “164” of the Complaint as it relates to Lawyers Title.

165. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “165” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “165” of the Complaint as it relates to Lawyers Title.

166. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “166” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “166” of the Complaint as it relates to Lawyers Title.

167. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “167” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “167” of the Complaint as it relates to Lawyers Title.

168. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “169” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “169” of the Complaint as it relates to Lawyers Title.

169. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “170” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “170” of the Complaint as it relates to Lawyers Title.

170. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “171” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “171” of the Complaint as it relates to Lawyers Title.

171. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “172” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “172” of the Complaint as it relates to Lawyers Title.

172. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “172” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “172” of the Complaint as it relates to Lawyers Title.

173. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “173” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “173” of the Complaint as it relates to Lawyers Title.

174. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “174” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “174” of the Complaint as it relates to Lawyers Title.

175. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “175” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “175” of the Complaint as it relates to Lawyers Title.

176. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “176” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “176” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT IX – NEGLIGENCE**

177. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “176” as if more fully set forth at length herein.

178. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “178” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “178” of the Complaint as it relates to Lawyers Title.

179. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “179” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “179” of the Complaint as it relates to Lawyers Title.

180. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “180” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “180” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT X – INJUNCTIVE RELIEF**

181. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “180” as if more fully set forth at length herein.

182. Defendant Lawyers Title denies each and every allegation contained in paragraph “182” of the Complaint in its entirety.

183. Defendant Lawyers Title denies each and every allegation contained in paragraph “183” of the Complaint in its entirety.

184. Defendant Lawyers Title denies each and every allegation contained in paragraph “184” of the Complaint in its entirety.

185. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “185” of the Complaint.

**AS AND FOR DEFENDANT LAWYER TITLE'S ANSWER TO
PLAINTIFFS' COUNT XI – UNJUST ENRICHMENT**

186. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “185” as if more fully set forth at length herein.

187. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “187” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “187” of the Complaint as it relates to Lawyers Title.

188. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “188” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “188” of the Complaint as it relates to Lawyers Title.

189. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “189” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “189” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE'S ANSWER TO
PLAINTIFFS' COUNT XII – UNLAWFUL, UNFAIR OR
FRAUDULENT BUSINESS ACTS AND PRACTICES IN
VIOLATIONS OF CAL. BUS. & PROFESSIONAL CODE §17200**

190. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “189” as if more fully set forth at length herein.

191. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “191” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “191” of the Complaint as it relates to Lawyers Title.

192. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “192” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “192” of the Complaint as it relates to Lawyers Title.

193. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “193” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “193” of the Complaint as it relates to Lawyers Title.

194. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “194” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “194” of the Complaint as it relates to Lawyers Title.

195. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “195” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “195” of the Complaint as it relates to Lawyers Title.

196. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “196” of the Complaint as it relates to all other

Defendants except denies each and every allegation contained in paragraph “196” of the Complaint as it relates to Lawyers Title.

197. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “197” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “197” of the Complaint as it relates to Lawyers Title.

198. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “198” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “198” of the Complaint as it relates to Lawyers Title.

199. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “199” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “199” of the Complaint as it relates to Lawyers Title.

200. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “200” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “200” of the Complaint as it relates to Lawyers Title.

201. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “201” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “201” of the Complaint as it relates to Lawyers Title.

202. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “202” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “202” of the Complaint as it relates to Lawyers Title.

**AS AND FOR DEFENDANT LAWYER TITLE’S ANSWER TO
PLAINTIFFS’ COUNT XIII – BREACH OF CONTRACT**

203. Defendant Lawyers Title repeats and reiterates each and every answer to the Complaint to paragraphs designated “1” through “202” as if more fully set forth at length herein.

204. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “204” of the Complaint as it relates to all other Defendants except denies each and every allegation contained in paragraph “204” of the Complaint as it relates to Lawyers Title.

205. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “205” of the Complaint.

206. Defendant Lawyers Title denies knowledge or information sufficient to form a belief as to the allegations of paragraph “206” of the Complaint.

207. Defendant Lawyers Title denies each and every allegation contained in paragraph “207” of the Complaint in its entirety.

208. Defendant Lawyers Title denies each and every judgment request by Plaintiffs contained in paragraph “A” of the complaint.

209. Defendant Lawyers Title denies each and every judgment request by Plaintiffs contained in paragraph “B” of the complaint.

210. Paragraph “C” of the Complaint does not relate to this action.

211. Paragraph “D” of the Complaint does not relate to this action.

212. Paragraph “E” of the Complaint does not relate to this action.

213. Paragraph “F” of the Complaint does not relate to this action.

214. Defendant Lawyers Title denies each and every judgment request by Plaintiff contained in paragraph “G” of the complaint.

215. Defendant Lawyers Title denies each and every judgment request by Plaintiff contained in paragraph “H” of the complaint.

216. Defendant Lawyers Title denies each and every judgment request by Plaintiff contained in paragraph “I” of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

217. The Complaint fails to state a claim upon which relief can be granted.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

218. If any damages were sustained by the Plaintiffs as part of the allegations in the Complaint, such damages are attributable to Plaintiffs’ own culpable conduct.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

219. Plaintiffs’ causes of action in the complaint are barred in whole or in part by the waiver, laches and/or estoppel.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

220. The complaint fails to state a cause of action against Defendant Lawyers Title Company.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

221. Defendant Lawyers Title has at all times acted lawfully, properly and in good faith.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

222. Answering Defendant did not partake in the fraud alleged in Plaintiffs' Complaint.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

223. If any damages were sustained by the Plaintiffs as part of the allegations in the Complaint, such damages are attributable to the culpable conduct of the Plaintiffs and/or the other Defendants in this action, and if any damages are recoverable against this Defendant, the amount of such damages shall be diminished in the proportion which the culpable conduct attributable to the Plaintiffs and/or third parties bears to the culpable conduct which caused the damages.

**AS AND FOR A FIRST CROSSCLAIM AGAINST
DEFENDANTS DONALD J. TRUMP, TRUMP ORGANIZATION, INC.,
TRUMP ORGANIZATION, LLC, TRUMP MARKS, LLC, TRUMP MARKS
BAJA, LLC, IRONGATE DEVELOPMENT, IRONGATE WISHIRE, LLC,
IRONGATE CAPITAL PARTNERS, LLC, JASON GROSFELD, ADAM FISHER,
RICHARD FISHER, CASEY FEDERMAN, JOSHUA CRANE, FIRST AMERICAN
FUND CONTROL, INC., CALIFORNIA FUND CONTROL, INC., SOUTHLAND
TITLE CORP., SOUTHLAND TITLE OF SAN DIEGO, LANDAMERICA
TITLE COMP., and PB IMPULSOIRES, S. de R.L. de C.V.,
BANCO J.P. MORGAN, S.A., INSTITUCION DE BANCA MULTIPLE,
J.P. MORGAN GROUPO FINANCIERO, DIVISION FIDUCIARIA**

224. Lawyers Title Company repeats and realleges each and every allegation contained in paragraphs "1" through "223" with the same force and effect as if fully set forth herein.

225. Upon information and belief, Defendants Donald J. Trump, Trump Organization, Inc., Trump Organization, LLC, Trump Marks, LLC, Trump Marks Baja, LLC, Irongate

Development, Irongate Wishire, LLC, Irongate Capital Partners, LLC, Jason Grosfeld, Adam Fisher, Richard Fisher, Casey Federman, Joshua Crane, First American Fund Control, Inc., California Fund Control, Inc., Southland Title Corp., Southland Title of San Diego, Landamerica Title Comp., And PB Impulsores, S. de R.L. de C.V., Banco J.P. Morgan, S.A., Institucion de Banca Multiple, and J.P. Morgan Grupo Financiero, Division Fiduciaria, engaged in the wrongful acts alleged by the Plaintiffs in their Complaint thereby damaging the answering Defendant through exposure to this suit and possible financial liability from any resulting award.

226. In the event of any monetary liability incurred or levied against answering Defendant as a result of an award to the Plaintiffs or any other Defendants, upon information and belief, such liability is the direct responsibility and incurred through the fault or acts of Defendants Donald J. Trump, Trump Organization, Inc., Trump Organization, LLC, Trump Marks, LLC, Trump Marks Baja, LLC, Irongate Development, Irongate Wishire, LLC, Irongate Capital Partners, LLC, Jason Grosfeld, Adam Fisher, Richard Fisher, Casey Federman, Joshua Crane, First American Fund Control, Inc., California Fund Control, Inc., Southland Title Corp., Southland Title of San Diego, Landamerica Title Comp., And PB Impulsores, S. de R.L. de C.V., Banco J.P. Morgan, S.A., Institucion de Banca Multiple, and J.P. Morgan Grupo Financiero, Division Fiduciaria, independent of any acts and without the knowledge or consent of this answering Defendant.

227. As a result this answering Defendant is entitled to a judgment against Defendants, Donald J. Trump, Trump Organization, Inc., Trump Organization, LLC, Trump Marks, LLC, Trump Marks Baja, LLC, Irongate Development, Irongate Wishire, LLC, Irongate Capital Partners, LLC, Jason Grosfeld, Adam Fisher, Richard Fisher, Casey Federman, Joshua Crane, First American Fund Control, Inc., California Fund Control, Inc., Southland Title Corp.,


Southland Title of San Diego, Landamerica Title Comp., And PB Impulsores, S. de R.L. de C.V., Banco J.P. Morgan, S.A., Institucion de Banca Multiple, and J.P. Morgan Grupo Financiero, Division Fiduciaria commensurate with any monetary award or judgment rendered against Lawyers Title Company.

WHEREFORE, judgment is demanded in favor of Defendant, Lawyers Title Company, as follows:

- (a) dismissing Plaintiffs' Complaint in its entirety against Lawyers Title Company;
- (b) costs and disbursements of this action, together with reasonable attorneys' fees;
- (c) judgment in favor of Lawyers Title Company and against Defendants, Donald J. Trump, Trump Organization, Inc., Trump Organization, LLC, Trump Marks, LLC, Trump Marks Baja, LLC, Irongate Development, Irongate Wishire, LLC, Irongate Capital Partners, LLC, Jason Grosfeld, Adam Fisher, Richard Fisher, Casey Federman, Joshua Crane, First American Fund Control, Inc., California Fund Control, Inc., Southland Title Corp., Southland Title of San Diego, Landamerica Title Comp., And PB Impulsores, S. de R.L. de C.V., Banco J.P. Morgan, S.A., Institucion de Banca Multiple, and J.P. Morgan Grupo Financiero, Division Fiduciaria for indemnification in an amount equal to the full amount of any award or judgment entered in favor of the Plaintiffs and against Defendant, Lawyers Title Company;and

(d) for such other and further relief as to this Court may seem just, equitable and proper.

Dated: New York, New York
June 25, 2009



CHRISTOPHER P. KOHN
Attorney for Defendant, Lawyers Title
350 Fifth Avenue, Suite 5016
New York, New York 10118
646-708-8090
Fax: 212-594-8378

TO: Joe R. Whatley, Jr., Esq.
Whatley Drake & Kallas, LLC
Attorneys for Plaintiffs
1540 Broadway, 37th Floor
New York, New York 10036

Audet & Partners, LLP
William M. Audet, Esq.
221 Main Street, Suite 1460
San Francisco, California 94105

Trump Marks Baja, LLC
c/o National Registered Agents, Inc.
875 Avenue of the Americas, Suite 501
New York, New York 10001

Trump Marks, LLC
c/o National Registered Agents, Inc.
875 Avenue of the Americas, Suite 501
New York, New York 10001

Trump Organization, LLC
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875 Avenue of the Americas, Suite 501
New York, New York 10001

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875 Avenue of the Americas, Suite 501
New York, New York 10001

Donald J. Trump
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Los Angeles, California 90024

Casey Federman
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Jason Grosfeld
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Irongate Capital Partners, LLC
c/o Adam Fisher
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Richard Fisher
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Irongate Wilshire, LLC
c/o James Krause
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

California Fund Control, Inc.
c/o Timothy P. Sullivan
1 First American Way
Santa Ana, California 92707

First American Fund Control, Inc.
c/o Timothy P. Sullivan
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Santa Ana, California 92707

Irongate Development
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

LandAmerica Title Company
c/o Capital Corporation Services, Inc.
455 Capital Mall, Suite 217
Sacramento, California 95814

Southland Title Corporation
c/o Capital Corporation Services, Inc.
455 Capital Mall, Suite 217
Sacramento, California 95814

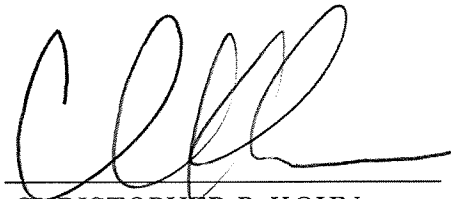
Southland Title of San Diego
c/o Capital Corporation Services, Inc.
455 Capital Mall, Suite 217
Sacramento, California 95814

ATTORNEY'S VERIFICATION

CHRISTOPHER P. KOHN, affirms, under penalties of perjury, that I am an attorney licensed to practice in the State of New York and the attorney for Defendant, LAWYERS TITLE COMPANY, that I have read the foregoing Answer and know the contents thereof; that the same is true to my own knowledge, except as to matters therein stated to be alleged upon information and belief, the basis of which is a review of the file maintained by me relating to the instant action and conversations with Defendant concerning the same, and that as to those matters I believe them to be true.

This verification is made by Defendant's counsel pursuant to CPLR 3020 (d) (3) because Defendant is a foreign corporation and is not within the county of New York where my office is maintained.

Dated: New York, New York
June 25, 2009


CHRISTOPHER P. KOHN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
HENRY LAM, on behalf of himself and all
others similarly situated,

CLASS ACTION No.: 09CV5211

Plaintiffs,

-against-

AFFIDAVIT OF SERVICE

DONALD J. TRUMP, TRUMP
ORGANIZATION, INC., TRUMP
ORGANIZATION, LLC, TRUMP MARKS,
LLC, TRUMP MARKS BAJA, LLC,
IRONGATE DEVELOPMENT, IRONGATE
WISHIRE, LLC, IRONGATE CAPITAL
PARTNERS, LLC, JASON GROSFELD,
ADAM FISHER, RICHARD FISHER,
CASEY FEDERMAN, JOSHUA CRANE,
FIRST AMERICAN FUND CONTROL, INC.,
CALIFORNIA FUND CONTROL, INC.,
SOUTHLAND TITLE CORP., SOUTHLAND
TITLE OF SAN DIEGO, LAWYERS TITLE
COMP., LANDAMERICA TITLE COMP.,
and PB IMPULSORES, S. de R.L. de C.V.
BANCO J.P. MORGAN, S.A., INSTITUCION
DE BANCA MULTIPLE, J.P. MORGAN
GRUPO FINANCIERO, DIVISION
FIDUCIARIA,

Defendants.

-----X
STATE OF NEW YORK,

ss.:

COUNTY OF NEW YORK

I, Joanne Mazarese, being sworn, say: I am not a party to the action. I am over 18 years of age and reside in the State of New York.

On the 25th day of June 2009, I served the within VERIFIED ANSWER WITH
AFFIRMATIVE DEFENSES AND CROSS-CLAIMS upon:

Joe R. Whatley, Jr., Esq.
Whatley Drake & Kallas, LLC
1540 Broadway, 37th Floor
New York, New York 10036

Audet & Partners, LLP
William M. Audet, Esq.
221 Main Street, Suite 1460
San Francisco, California 94105

Trump Marks Baja, LLC
c/o National Registered Agents, Inc.
875 Avenue of the Americas, Suite 501
New York, New York 10001

Trump Organization, LLC
c/o National Registered Agents, Inc.
875 Avenue of the Americas, Suite 501
New York, New York 10001

Donald J. Trump
c/o National Registered Agents, Inc.
875 Avenue of the Americas, Suite 501
New York, New York 10001

Casey Federman
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Irongate Capital Partners, LLC
c/o Adam Fisher
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Irongate Wilshire, LLC
c/o James Krause
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

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c/o Timothy P. Sullivan
1 First American Way
Santa Ana, California 92707

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Sacramento, California 95814

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Santa Ana, California 92707

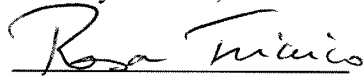
Irongate Development
10880 Wilshire Boulevard, Suite 1460
Los Angeles, California 90024

Southland Title Corporation
c/o Capital Corporation Services, Inc.
455 Capital Mall, Suite 217
Sacramento, California 95814

by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to them at their last known address set forth after their names.


Joanne Mazarese

Sworn to before me on the
25th day of June, 2009



Notary Public

ROSA TRICARICO
NOTARY PUBLIC STATE OF NY
01TR5082931
QUALIFIED IN KINGS COUNTY
COMMISSION EXPIRES ON 20 08, Aug. 4

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CLASS ACTION No.: 09CV5211

HENRY LAM, on behalf of himself and all
others similarly situated,

Plaintiffs,

-against-

DONALD J. TRUMP, TRUMP ORGANIZATION, INC., TRUMP
ORGANIZATION, LLC, TRUMP MARKS, LLC, TRUMP MARKS
BAJA, LLC, IRONGATE DEVELOPMENT, IRONGATE
WISHIRE, LLC, IRONGATE CAPITAL PARTNERS, LLC, JASON
GROSFELD, ADAM FISHER, RICHARD FISHER, CASEY
FEDERMAN, JOSHUA CRANE, FIRST AMERICAN FUND
CONTROL, INC., CALIFORNIA FUND CONTROL, INC.,
SOUTHLAND TITLE CORP., SOUTHLAND TITLE OF SAN DIEGO,
LAWYERS TITLE COMP., LANDAMERICA TITLE COMP., and
PB IMPULSOIRES, S. de R.L. de C.V. BANCO J.P. MORGAN, S.A.,
INSTITUCION DE BANCA MULTIPLE, J.P. MORGAN GROUPO
FINANCIERO, DIVISION FIDUCIARIA,

Defendants.

**VERIFIED ANSWER WITH AFFIRMATIVE
DEFENSES AND CROSS-CLAIMS**

CHRISTOPHER P. KOHN, ESQ.

Attorney for Defendant Lawyers Title Company
350 Fifth Avenue, Suite 5016
New York, New York 10118
646-708-8090
Fax: 212-594-8378